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JP Morgan Chase & Co.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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PATIENT CARE ASSOCIATES a/s/o A.A., N.B., :
P.D., C.E., K.N., and F.R., :

Plaintiff,

-against-

JP MORGAN CHASE & Co.; ABC CORP. (1-10) :
(Said names being fictitious and unknown :
entities), :

Defendants. :
----- X

Civil Action No. 13-1819 (CCC)

**NOTICE OF MOTION FOR
ADMISSION PRO HAC VICE**

TO: Andrew R. Bronsnick, Esq.
MASSOOD & BRONSNICK, LLC
50 Packanack Lake Road East
Wayne, New Jersey 07470

PLEASE TAKE NOTICE that on May 20, 2013 at 9:00 a.m., or as soon thereafter as counsel may be heard, Defendant JP Morgan Chase & Co. ("JPMC"), by its undersigned counsel, Proskauer Rose LLP, shall move before the Honorable Joseph A. Dickson, U.S.M.J., at the United States District Court for the District of New Jersey located at the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order admitting Howard Shapiro, Esq. *pro hac vice* in this action.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, JPMC submits herewith the Certifications of Lawrence R. Sandak, Esq. and Howard Shapiro, Esq. JPMC also submits herewith a proposed form of Order granting the admission *pro hac vice* of Howard Shapiro, Esq. to practice before this Court, in this case, as counsel for Defendant.

PLEASE TAKE FURTHER NOTICE that the Plaintiff has consented to this motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 7.1(d)(1), no brief is necessary in connection with this motion, inasmuch as the basis for this application is set forth in the accompanying affidavits.

Respectfully submitted,

PROSKAUER ROSE LLP

By: /s/ Lawrence R. Sandak
Lawrence R. Sandak, Esq.
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Dated: April 26, 2013